

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

TECSEC, INCORPORATED,	)	
	)	
<i>Plaintiff</i>	)	
	)	
v.	)	Case No. 1:10cv115
	)	(LMB/TCB)
INTERNATIONAL BUSINESS MACHINES	)	
CORPORATION, <i>et al.</i> ,	)	
	)	
<i>Defendants</i>	)	

**DEFENDANT IBM'S  
EMERGENCY MOTION TO ENFORCE**

Pursuant to Federal Rule 37(b), Defendant International Business Machines Corporation ("IBM") moves the Court to enter an order enforcing the *Stipulated Protective Order* (Dkt. No. 210) and Court's directives from the bench on September 10, 2010 regarding access by plaintiff's outside counsel to IBM's source code and other Highly Confidential materials.

***IBM requests an emergency telephonic hearing on this motion.***

***Certificate:*** I hereby certify that a good faith effort was made by the movant to resolve this dispute without court intervention.

Dated: September 15, 2010

Respectfully submitted,

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# **CERTIFICATE OF SERVICE**

I hereby certify that on this 15th day of September 2010, a true and correct copy of the foregoing pleading or paper was served using the Court's CM/ECF system, with electronic notification of such filing to all counsel of record:

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